

# **Counsel to Donald J. Trump**

## **President of the United States of America**

Hon. Rudolph W. Giuliani  
Jay Alan Sekulow  
Jane Serene Raskin  
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November 20, 2018

### Via Hand Delivery

Robert S. Mueller, III  
Special Counsel  
395 E Street, S.W.  
Washington, D.C. 20530

Dear Mr. Mueller:

We write on behalf of the President of the United States in response to the September 17, 2018, letter from the Special Counsel's Office ("SCO") and the enclosed questions on what you describe as "Russia-related topics." Our response consists of two parts. In the first, we set forth specific issues and concerns raised by the questions propounded, explain the understandings upon which we are proceeding, and articulate the parameters within which our client has provided his responses. In the second, we set forth the President's responses to the questions which reflect, incorporate, and are to be understood in accordance with the parameters we have articulated.

## **CONSIDERATIONS AND LIMITATIONS**

### **A. Number, Nature, and Form of the Questions**

You have submitted to the President a series of complex, multi-part questions that suffer from an array of infirmities of form that would render them objectionable if propounded in routine federal litigation. Many are vague and ambiguous as to the meaning of the terms used;<sup>1</sup> some are

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<sup>1</sup> Examples include, but are not limited to, the following: I (e) ("communicate directly or indirectly"); I (f) ("Russian official or contact"); I (h) ("supported your candidacy" or "opposed the candidacy of Hillary Clinton"); I (i) ("tangible support" and "negative information about Hillary Clinton"); II (a) ("individuals associated with the Clinton campaign"); II (b) (i) ("potentially had possession of"); II (e) (iii) ("reaching out"); II (e) (iii) and (f) ("associated with you or your campaign"); II (g) ("nature of your communication(s)"); II (g) (iii) ("contacts" and "intermediary"); II (h) ("potential pardon" and "action to benefit"); III (f) ("publicly," "investigative inquiries," "potential or actual investments or business deals"); III (g) ("prospective or actual business interests, investments, or arrangements with Russia or any Russian interest or Russian individual"); IV (a) ("ties to the Ukrainian government" and "connections to the Ukrainian or Russian governments"); IV (c) ("anyone else associated with your campaign" and "any person located in Ukraine or Russia or associated with the Ukrainian or Russian governments"); IV (d) ("directly or indirectly"); and IV (i) ("what consideration did you give").

overbroad<sup>2</sup> or predicated on improper and unsupported assumptions;<sup>3</sup> and others are duplicative and confusing.<sup>4</sup> Most of the questions invite speculative answers about brief interactions that may have taken place in passing over two years ago during critical days of an extraordinarily eventful and fast-paced presidential election campaign. The questions would be burdensome if submitted to a routine witness, let alone presented to the President of the United States, more than two years after the events at issue while he continued to navigate numerous, serious matters of state, national security, and domestic emergency.<sup>5</sup>

## **B. Availability of Information from Other Sources**

The questions confirm what we have repeatedly suggested to you throughout our discussions regarding your request to interview the President: The information you seek has been available to the SCO in overwhelming measure for well over a year through interviews of third-party witnesses, many of whom were voluntarily produced by the Office of the President; through Congressional testimony and public reporting; and through the 1.4 million-plus pages of documents produced by the White House, the Donald J. Trump for President Campaign, and the Trump Organization. We reiterate that those sources of information remain alternative avenues for your inquiry that obviate the need to impose upon the President, given his unique position and responsibilities, the burdensome task of responding to these questions.

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<sup>2</sup> Examples include, but are not limited to, the following: II (d) (iii) (“Were you told at any time before or after [July 27, 2016] that Russia was attempting to infiltrate or hack computer systems or email accounts of Hillary Clinton or her campaign,” which could be read to encompass any discussion about the likelihood that Mrs. Clinton’s use of a private, unsecure server while Secretary of State invited attempts by Russia to hack her computer systems or email accounts); II (i) (“Were you aware of any efforts by foreign individuals or companies, including those in Russia, to assist your campaign through the use of social media postings,” which could embrace, for example, any foreign national who posted a pro-Trump status or message on Facebook or Twitter); and III (g) (“did you or the Trump Organization have any other prospective or actual business interests, investments, or arrangements with Russia or any Russian interest or Russian individual,” which could be read to include anything from a Trump Organization catering order with a delicatessen owned by a Russian national to the ownership of shares in an international fund that could have insignificant, legal holdings in a Russian-affiliated company). In some cases, the questions as drafted are so overbroad and confusing as to render impossible any meaningful answer, and the responses reflect this reality.

<sup>3</sup> Questions I (a) through (c), for example, presuppose advance knowledge of the June 9, 2016, meeting. Question I (i), in addition to containing vague and ambiguous language, is founded on two unsupported assumptions: First, that “Russia or Vladimir Putin, had provided, wished to provide, or offered to provide tangible support to [the] campaign”; and second, that an offer “to provide negative information about Hillary Clinton” would constitute an offer of “tangible support” to the campaign.

<sup>4</sup> Examples include, but are not limited to, the following: II (c), (e) (iii), and (f).

<sup>5</sup> Responding to the SCO’s written questions has required the President to spend hours of time with counsel in the midst of, among other things: (1) An ongoing national security and humanitarian crisis at the southern border; (2) Multiple natural disasters and tragedies around the country; (3) Active measures to withdraw the United States from the Intermediate-range Nuclear Forces Treaty with Russia; (4) Negotiations at the highest level over the denuclearization of the Korean Peninsula; (5) Pressing forward on the imposition of sanctions on Iran; (6) Ongoing national security decisions concerning American engagement in Syria, Afghanistan, and elsewhere; and (7) Critical-stage trade negotiations with foreign governments.

### **C. Predicate and Need for the Information Requested**

Closely related to our observation that there exist alternative sources for the information you seek from the President is our long-standing and oft-expressed concern regarding the underlying relevance of, and need for, the information. We repeatedly have asked you to articulate any theory of suspected liability arising out of your investigation of possible links or coordination between the Russian government and the Trump Campaign under which you would perceive a critical need to seek information directly from the President.<sup>6</sup>

Despite your persistent refusal to answer that fundamental question, we agreed to provide responses to your “Russia-related” written questions in order to move this matter to conclusion and avoid protracted and unnecessary constitutional litigation. Our expectation was that the questions themselves would surely shed light on the issue. Having now received and reviewed your questions, especially in the context of the extensive information already available to you, we remain skeptical as to the existence of any justifiable predicate for the extraordinary exercise upon which you have asked the President to embark. Simply put, you have given us no basis to believe the President has important information regarding any offense involving links or coordination with the Russian government and persons associated with the Trump Campaign or any other information the ascertainment of which could lead to any of the SCO’s substantive goals.

We are also concerned about the timing of the SCO’s recent spate of investigatory activity, including requests for additional interviews and documents, even as our client has been engaged in the process of preparing responses to your questions. All of this has occurred eighteen months into your investigation. As we have maintained from the outset, both as a matter of historical precedent and in keeping with the reasoning of *In re Sealed Case (Espy)*, 121 F.3d 729 (D.C. Cir. 1997), a request for information directly from the President, given the extraordinary burden it poses, should be a matter of last resort. When we met in late April, you signaled your agreement with these concepts – at least in principal. In this context and given our expressed concerns regarding the underlying predicate and need for your request for information from the President, we again ask that you identify the theory of liability under which you are proceeding, if any, and provide us the opportunity to formally present our position in response before you pursue any further investigative step relating to our client or submit your final report.

Nevertheless, despite the concerns and reservations articulated above, the President herewith offers good faith responses to your Russia-related inquiries, according to his current recollection of his knowledge at the time, in a format that provides the information requested while attempting to avoid falling prey to the confusion, repetition, appeals for unwarranted speculation, and fodder for

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<sup>6</sup> In fact, when we first asked you to identify any potential violation of federal criminal law involving coordination or collusion with Russia, the SCO referred us to the language of your order of appointment linking your mandate to the counterintelligence investigation disclosed by former FBI Director James Comey during his congressional testimony, including “an assessment of whether any crimes were committed.” As we pointed out at the time, and as you are undoubtedly aware, a counterintelligence investigation is not a criminal investigation, and the FBI defines an investigatory “assessment” as an entry level evaluation commenced with “no particular factual predication” – facts that place the language of the order of appointment in conflict with 28 C.F.R. § 600.1, which authorizes the appointment of a Special Counsel only when it is “determine[d] that criminal investigation of a person or matter is warranted.” See May 10, 2018, letter from Jane Serene Raskin to Robert S. Mueller; May 16, 2018, email from James L. Quarles to Jane Serene Raskin; and May 21, 2018, email from Jane Serene Raskin to James L. Quarles.

misinterpretation inherent in the questions as drafted. He does so in keeping with his unprecedented level of transparency and in order to move this investigation toward a prompt conclusion. As set forth below, the President's responses are limited to discussing the time period to which we agreed in advance as well as by our agreed upon understanding regarding issues of executive privilege.

We reiterate our oft-stated concerns that this investigation has been plagued with both conflicts of interest and highly irregular conduct and that it has lacked justification from the outset. The President nevertheless has decided to respond to these questions to facilitate a rapid conclusion to the process, without waiver of his constitutional and statutory privileges or objections. We remain cognizant of the duty to ensure that the Office of the President is not exposed to these types of conflicts of interest and irregularities in the future.

#### **D. Relevant Time Period**

In keeping with our agreement, the President has responded to the questions as they pertain to the period of his presidential campaign, June 16, 2015, through November 8, 2016. To the extent any of the questions seek information concerning the President's actions while in office, or otherwise implicate executive privileges, they would exceed our agreed parameters for the written questions. *See, e.g.*, August 31, 2018, letter from James L. Quarles to Jane Serene Raskin (“[W]e will provide your client with a set of written questions exclusively on Russia-related topics, in an effort to avoid executive privilege issues” and “we would forego asking questions pertaining to your client's actions while in office”). For example, if read to embrace such information, the questions within Category I – “June 9, 2016 Meeting at Trump Tower” – would appear directed not to the June 9, 2016, meeting itself, but rather to actions and communications of the sitting President, his senior staff, and his lawyers as they reacted and responded to media inquiries and reporting regarding the June 9, 2016, meeting a full year later — as the President returned from the G20 summit in Germany and prepared to depart for Paris to meet with the President of France. Such an inquiry would not be “Russia-related” and would also raise issues of executive privilege.

Questions V (b) through (h) request information concerning the then President-elect's deliberations and communications with senior staff regarding national security and foreign policy issues during the final days of the transition. These questions raise issues of executive privilege, and, before responding, our client would need the benefit of institutional advice on the application of executive privileges to them. Accordingly, at this time the President declines to respond to Questions V (b) through (h) in their entirety. We remind you that as to each of those questions you have a variety of sources available to you for the requested information, including interviews — many of them multiple — with the then President-elect's senior national security staff; public statements and sworn testimony before Congress; and the voluminous White House and Campaign documents produced to you.

To be clear, we interpret the submitted questions as seeking information only as to the President's knowledge, actions and communications during the time period of his campaign for the presidency, June 16, 2015 through November 8, 2016. His answers are so limited.

#### **E. Privilege Issues**

The President does not waive any executive privilege, and his responses are intended to exclude information that may be subject to any executive privilege. Nor does the President waive attorney-client privilege, and his responses are intended to exclude information protected by that privilege

or by the attorney-work product doctrine. In submitting these responses, the President does not waive any of the privileges or protections articulated above or any other applicable privilege or immunity. Should any of the President's responses contain a disclosure of any such information, it is inadvertent and shall not constitute a waiver of any privilege or immunity.

Sincerely,

A handwritten signature in black ink, appearing to read "Jane Serene Raskin".


JANE SERENE RASKIN

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HON. RUDOLPH GIULIANI

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MARTIN R. RASKIN

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JAY ALAN SEKULOW

*Counsel to the President*

## RESPONSES OF PRESIDENT DONALD J. TRUMP

### **I. June 9, 2016 Meeting at Trump Tower**

- a. When did you first learn that Donald Trump, Jr., Paul Manafort, or Jared Kushner was considering participating in a meeting in June 2016 concerning potentially negative information about Hillary Clinton? Describe who you learned the information from and the substance of the discussion.
- b. Attached to this document as Exhibit A is a series of emails from June 2016 between, among others, Donald Trump, Jr. and Rob Goldstone. In addition to the emails reflected in Exhibit A, Donald Trump, Jr. had other communications with Rob Goldstone and Emin Agalarov between June 3, 2016, and June 9, 2016.
  - i. Did Mr. Trump, Jr. or anyone else tell you about or show you any of these communications? If yes, describe who discussed the communications with you, when, and the substance of the discussion(s).
  - ii. When did you first see or learn about all or any part of the emails reflected in Exhibit A?
  - iii. When did you first learn that the proposed meeting involved or was described as being part of Russia and its government's support for your candidacy?
  - iv. Did you suggest to or direct anyone not to discuss or release publicly all or any portion of the emails reflected in Exhibit A? If yes, describe who you communicated with, when, the substance of the communication(s), and why you took that action.
- c. On June 9, 2016, Donald Trump, Jr., Paul Manafort, and Jared Kushner attended a meeting at Trump Tower with several individuals, including a Russian lawyer, Natalia Veselnitskaya (the "June 9 meeting").
  - i. Other than as set forth in your answers to I.a and I.b, what, if anything, were you told about the possibility of this meeting taking place, or the scheduling of such a meeting? Describe who you discussed this with, when, and what you were informed about the meeting.
  - ii. When did you learn that some of the individuals attending the June 9 meeting were Russian or had any affiliation with any part of the Russian government? Describe who you learned this information from and the substance of the discussion(s).

- iii. What were you told about what was discussed at the June 9 meeting? Describe each conversation in which you were told about what was discussed at the meeting, who the conversation was with, when it occurred, and the substance of the statements they made about the meeting.
  - iv. Were you told that the June 9 meeting was about, in whole or in part, adoption and/or the Magnitsky Act? If yes, describe who you had that discussion with, when, and the substance of the discussion.
- d. For the period June 6, 2016 through June 9, 2016, for what portion of each day were you in Trump Tower?
  - i. Did you speak or meet with Donald Trump, Jr., Paul Manafort, or Jared Kushner on June 9, 2016? If yes, did any portion of any of those conversations or meetings include any reference to any aspect of the June 9 meeting? If yes, describe who you spoke with and the substance of the conversation.
- e. Did you communicate directly or indirectly with any member or representative of the Agalarov family after June 3, 2016? If yes, describe who you spoke with, when, and the substance of the communication.
- f. Did you learn of any communications between Donald Trump, Jr., Paul Manafort, or Jared Kushner and any member or representative of the Agalarov family, Natalia Veselnitskaya, Rob Goldstone, or any Russian official or contact that took place after June 9, 2016 and concerned the June 9 meeting or efforts by Russia to assist the campaign? If yes, describe who you learned this information from, when, and the substance of what you learned.
- g. On June 7, 2016, you gave a speech in which you said, in part, "I am going to give a major speech on probably Monday of next week and we're going to be discussing all of the things that have taken place with the Clintons."
  - i. Why did you make that statement?
  - ii. What information did you plan to share with respect to the Clintons?
  - iii. What did you believe the source(s) of that information would be?
  - iv. Did you expect any of the information to have come from the June 9 meeting?
  - v. Did anyone help draft the speech that you were referring to? If so, who?
  - vi. Why did you ultimately not give the speech you referenced on June 7, 2016?
- h. Did any person or entity inform you during the campaign that Vladimir Putin or the Russian

government supported your candidacy or opposed the candidacy of Hillary Clinton? If yes, describe the source(s) of the information, when you were informed, and the content of such discussion(s).

- i. Did any person or entity inform you during the campaign that any foreign government or foreign leader, other than Russia or Vladimir Putin, had provided, wished to provide, or offered to provide tangible support to your campaign, including by way of offering to provide negative information on Hillary Clinton? If yes, describe the source(s) of the information, when you were informed, and the content of such discussion(s).

#### **Response to Question I, Parts (a) through (c)**

I have no recollection of learning at the time that Donald Trump, Jr., Paul Manafort, or Jared Kushner was considering participating in a meeting in June 2016 concerning potentially negative information about Hillary Clinton. Nor do I recall learning during the campaign that the June 9, 2016 meeting had taken place, that the referenced emails existed, or that Donald J. Trump, Jr., had other communications with Emin Agalarov or Robert Goldstone between June 3, 2016 and June 9, 2016.

#### **Response to Question I, Part (d)**

I have no independent recollection of what portion of these four days in June of 2016 I spent in Trump Tower. This was one of many busy months during a fast-paced campaign, as the primary season was ending and we were preparing for the general election campaign.

I am now aware that my Campaign's calendar indicates that I was in New York City from June 6 – 9, 2016. Calendars kept in my Trump Tower office reflect that I had various calls and meetings scheduled for each of these days. While those calls and meetings may or may not actually have taken place, they do indicate that I was in Trump Tower during a portion of each of these working days, and I have no reason to doubt that I was. When I was in New York City, I stayed at my Trump Tower apartment.

My Trump Organization desk calendar also reflects that I was outside Trump Tower during portions of these days. The June 7, 2016 calendar indicates I was scheduled to leave Trump Tower in the early evening for Westchester where I gave remarks after winning the California, New Jersey, New Mexico, Montana, and South Dakota Republican primaries held that day. The June 8, 2016 calendar indicates a scheduled departure in late afternoon to attend a ceremony at my son's school. The June 9, 2016 calendar indicates I was scheduled to attend midday meetings and a fundraising luncheon at the Four Seasons Hotel. At this point, I do not remember on what dates these events occurred, but I do not currently have a reason to doubt that they took place as scheduled on my calendar.

Widely available media reports, including television footage, also shed light on my activities during these days. For example, I am aware that my June 7, 2016 victory remarks at the Trump



National Golf Club in Briarcliff Manor, New York, were recorded and published by the media. I remember winning those primaries and generally recall delivering remarks that evening.

At this point in time, I do not remember whether I spoke or met with Donald Trump, Jr., Paul Manafort, or Jared Kushner on June 9, 2016. My desk calendar indicates I was scheduled to meet with Paul Manafort on the morning of June 9, but I do not recall if that meeting took place. It was more than two years ago, at a time when I had many calls and interactions daily.

#### **Response to Question I, Part (e)**

I have no independent recollection of any communications I had with the Agalarov family or anyone I understood to be a representative of the Agalarov family after June 3, 2016 and before the end of the campaign. While preparing to respond to these questions, I have become aware of written communications with the Agalarovs during the campaign that were sent, received, and largely authored by my staff and which I understand have already been produced to you.

In general, the documents include congratulatory letters on my campaign victories, emails about a painting Emin and Aras Agalarov arranged to have delivered to Trump Tower as a birthday present, and emails regarding delivery of a book written by Aras Agalarov. The documents reflect that the deliveries were screened by the Secret Service.

#### **Response to Question I, Part (f)**

I do not recall being aware during the campaign of communications between Donald Trump, Jr., Paul Manafort, or Jared Kushner and any member or representative of the Agalarov family, Robert Goldstone, Natalia Veselnitskaya (whose name I was not familiar with), or anyone I understood to be a Russian official.

#### **Response to Question I, Part (g)**

In remarks I delivered the night I won the California, New Jersey, New Mexico, Montana, and South Dakota Republican primaries, I said, "I am going to give a major speech on probably Monday of next week and we're going to be discussing all of the things that have taken place with the Clintons." In general, I expected to give a speech referencing the publicly available, negative information about the Clintons, including, for example, Mrs. Clinton's failed policies, the Clintons' use of the State Department to further their interests and the interests of the Clinton Foundation, Mrs. Clinton's improper use of a private server for State Department business, the destruction of 33,000 emails on that server, and Mrs. Clinton's temperamental unsuitability for the office of President.

In the course of preparing to respond to your questions, I have become aware that the Campaign documents already produced to you reflect the drafting, evolution, and sources of information for the speech I expected to give "probably" on the Monday following my June 7, 2016 comments. These documents generally show that the text of the speech was initially drafted by Campaign staff

with input from various outside advisors and was based on publicly available material, including, in particular, information from the book *Clinton Cash* by Peter Schweizer.

The Pulse Nightclub terrorist attack took place in the early morning hours of Sunday, June 12, 2016. In light of that tragedy, I gave a speech directed more specifically to national security and terrorism than to the Clintons. That speech was delivered at the Saint Anselm College Institute of Politics in Manchester, New Hampshire, and, as reported, opened with the following:

This was going to be a speech on Hillary Clinton and how bad a President, especially in these times of Radical Islamic Terrorism, she would be. Even her former Secret Service Agent, who has seen her under pressure and in times of stress, has stated that she lacks the temperament and integrity to be president. There will be plenty of opportunity to discuss these important issues at a later time, and I will deliver that speech soon. But today there is only one thing to discuss: the growing threat of terrorism inside of our borders.

I continued to speak about Mrs. Clinton's failings throughout the campaign, using the information prepared for inclusion in the speech to which I referred on June 7, 2016.

#### **Response to Question I, Part (h)**

I have no recollection of being told during the campaign that Vladimir Putin or the Russian government "supported" my candidacy or "opposed" the candidacy of Hillary Clinton. However, I was aware of some reports indicating that President Putin had made complimentary statements about me.

#### **Response to Question I, Part (i)**

I have no recollection of being told during the campaign that any foreign government or foreign leader had provided, wished to provide, or offered to provide tangible support to my campaign.

## **II. Russian Hacking / Russian Efforts Using Social Media / WikiLeaks**

- a. On June 14, 2016, it was publicly reported that computer hackers had penetrated the computer network of the Democratic National Committee (DNC) and that Russian intelligence was behind the unauthorized access, or hack. Prior to June 14, 2016, were you provided any information about any potential or actual hacking of the computer systems or email accounts of the DNC, the Democratic Congressional Campaign Committee (DCCC), the Clinton Campaign, Hillary Clinton, or individuals associated with the Clinton campaign? If yes, describe who provided this information, when, and the substance of the information.

- b. On July 22, 2016, WikiLeaks released nearly 20,000 emails sent or received by Democratic party officials.
  - i. Prior to the July 22, 2016 release, were you aware from any source that WikiLeaks, Guccifer 2.0, DCLeaks, or Russians had or potentially had possession of or planned to release emails or information that could help your campaign or hurt the Clinton campaign? If yes, describe who you discussed this issue with, when, and the substance of the discussion(s).
  - ii. After the release of emails by WikiLeaks on July 22, 2016, were you told that WikiLeaks possessed or might possess additional information that could be released during the campaign? If yes, describe who provided this information, when, and what you were told.
- c. Are you aware of any communications during the campaign, directly or indirectly, between Roger Stone, Donald Trump, Jr., Paul Manafort, or Rick Gates and (a) WikiLeaks, (b) Julian Assange, (c) other representatives of WikiLeaks, (d) Guccifer 2.0, (e) representatives of Guccifer 2.0, or (f) representatives of DCLeaks? If yes, describe who provided you with this information, when you learned of the communications, and what you know about those communications.
- d. On July 27, 2016, you stated at a press conference: "Russia, if you're listening, I hope you're able to find the 30,000 emails that are missing. I think you will probably be rewarded mightily by our press."
  - i. Why did you make that request of Russia, as opposed to any other country, entity, or individual?
  - ii. In advance of making that statement, what discussions, if any, did you have with anyone else about the substance of the statement?
  - iii. Were you told at any time before or after you made that statement that Russia was attempting to infiltrate or hack computer systems or email accounts of Hillary Clinton or her campaign? If yes, describe who provided this information, when, and what you were told.
- e. On October 7, 2016, emails hacked from the account of John Podesta were released by WikiLeaks.
  - i. Where were you on October 7, 2016?
  - ii. Were you told at any time in advance of, or on the day of, the October 7 release that WikiLeaks possessed or might possess emails related to John Podesta? If yes, describe who told you this, when, and what you were told.

- iii. Are you aware of anyone associated with you or your campaign, including Roger Stone, reaching out to WikiLeaks, either directly or through an intermediary, on or about October 7, 2016? If yes, identify the person and describe the substance of the conversations or contacts.
- f. Were you told of anyone associated with you or your campaign, including Roger Stone, having any discussions, directly or indirectly, with WikiLeaks, Guccifer 2.0, or DCLeaks regarding the content or timing of release of hacked emails? If yes, describe who had such contacts, how you became aware of the contacts, when you became aware of the contacts, and the substance of the contacts.
- g. From June 1, 2016 through the end of the campaign, how frequently did you communicate with Roger Stone? Describe the nature of your communication(s) with Mr. Stone.
  - i. During that time period, what efforts did Mr. Stone tell you he was making to assist your campaign, and what requests, if any, did you make of Mr. Stone?
  - ii. Did Mr. Stone ever discuss WikiLeaks with you or, as far as you were aware, with anyone else associated with the campaign? If yes, describe what you were told, from whom, and when.
  - iii. Did Mr. Stone at anytime inform you about contacts he had with WikiLeaks or any intermediary of WikiLeaks, or about forthcoming releases of information? If yes, describe what Stone told you and when.
- h. Did you have any discussions prior to January 20, 2017, regarding a potential pardon or other action to benefit Julian Assange? If yes, describe who you had the discussion(s) with, when, and the content of the discussion(s).
- i. Were you aware of any efforts by foreign individuals or companies, including those in Russia, to assist your campaign through the use of social media postings or the organization of rallies? If yes, identify who you discussed such assistance with, when, and the content of the discussion(s).

#### **Response to Question II, Part (a)**

I do not remember the date on which it was publicly reported that the DNC had been hacked, but my best recollection is that I learned of the hacking at or shortly after the time it became the subject of media reporting. I do not recall being provided any information during the campaign about the hacking of any of the named entities or individuals before it became the subject of media reporting.

**Response to Question II, Part (b)**

I recall that in the months leading up to the election there was considerable media reporting about the possible hacking and release of campaign-related information and there was a lot of talk about this matter. At the time, I was generally aware of these media reports and may have discussed these issues with my campaign staff or others, but at this point in time – more than two years later – I have no recollection of any particular conversation, when it occurred, or who the participants were.

**Response to Question II, Part (c)**

I do not recall being aware during the campaign of any communications between the individuals named in Question II (c) and anyone I understood to be a representative of WikiLeaks or any of the other individuals or entities referred to in the question.

**Response to Question II, Part (d)**

I made the statement quoted in Question II (d) in jest and sarcastically, as was apparent to any objective observer. The context of the statement is evident in the full reading or viewing of the July 27, 2016 press conference, and I refer you to the publicly available transcript and video of that press conference. I do not recall having any discussion about the substance of the statement in advance of the press conference. I do not recall being told during the campaign of any efforts by Russia to infiltrate or hack the computer systems or email accounts of Hillary Clinton or her campaign prior to them becoming the subject of media reporting and I have no recollection of any particular conversation in that regard.

**Response to Question II, Part (e)**

I was in Trump Tower in New York City on October 7, 2016. I have no recollection of being told that WikiLeaks possessed or might possess emails related to John Podesta before the release of Mr. Podesta's emails was reported by the media. Likewise, I have no recollection of being told that Roger Stone, anyone acting as an intermediary for Roger Stone, or anyone associated with my campaign had communicated with WikiLeaks on October 7, 2016.

**Response to Question II, Part (f)**

I do not recall being told during the campaign that Roger Stone or anyone associated with my campaign had discussions with any of the entities named in the question regarding the content or timing of release of hacked emails.

**Response to Question II, Part (g)**

I spoke by telephone with Roger Stone from time to time during the campaign. I have no recollection of the specifics of any conversations I had with Mr. Stone between June 1, 2016 and

November 8, 2016. I do not recall discussing WikiLeaks with him, nor do I recall being aware of Mr. Stone having discussed WikiLeaks with individuals associated with my campaign, although I was aware that WikiLeaks was the subject of media reporting and campaign-related discussion at the time.

**Response to Question II, Part (h)**

I do not recall having had any discussion during the campaign regarding a pardon or action to benefit Julian Assange.

**Response to Question II, Part (i)**

I do not recall being aware during the campaign of specific efforts by foreign individuals or companies to assist my campaign through the use of social media postings or the organization of rallies.

**III. The Trump Organization Moscow Project**

- a. In October 2015, a “Letter of Intent,” a copy of which is attached as Exhibit B, was signed for a proposed Trump Organization project in Moscow (the “Trump Moscow project”).
  - i. When were you first informed of discussions about the Trump Moscow project? By whom? What were you told about the project?
  - ii. Did you sign the letter of intent?
- b. In a statement provided to Congress, attached as Exhibit C, Michael Cohen stated: “To the best of my knowledge, Mr. Trump was never in contact with anyone about this proposal other than me on three occasions, including signing a non-binding letter of intent in 2015.” Describe all discussions you had with Mr. Cohen, or anyone else associated with the Trump Organization, about the Trump Moscow project, including who you spoke with, when, and the substance of the discussion(s).
- c. Did you learn of any communications between Michael Cohen or Felix Sater and any Russian government officials, including officials in the office of Dmitry Peskov, regarding the Trump Moscow project? If so, identify who provided this information to you, when, and the substance of what you learned.
- d. Did you have any discussions between June 2015 and June 2016 regarding a potential trip to Russia by you and/or Michael Cohen for reasons related to the Trump Moscow project? If yes, describe who you spoke with, when, and the substance of the discussion(s).
- e. Did you at any time direct or suggest that discussions about the Trump Moscow project

should cease, or were you informed at any time that the project had been abandoned? If yes, describe who you spoke with, when, the substance of the discussion(s), and why that decision was made.

- f. Did you have any discussions regarding what information would be provided publicly or in response to investigative inquiries about potential or actual investments or business deals the Trump Organization had in Russia, including the Trump Moscow project? If yes, describe who you spoke with, when, and the substance of the discussion(s).
- g. Aside from the Trump Moscow project, did you or the Trump Organization have any other prospective or actual business interests, investments, or arrangements with Russia or any Russian interest or Russian individual during the campaign? If yes, describe the business interests, investments, or arrangements.

#### **Response to Question III, Parts (a) through (g)**

Sometime in 2015, Michael Cohen suggested to me the possibility of a Trump Organization project in Moscow. As I recall, Mr. Cohen described this as a proposed project of a general type we have done in the past in a variety of locations. I signed the non-binding Letter of Intent attached to your questions as Exhibit B which required no equity or expenditure on our end and was consistent with our ongoing efforts to expand into significant markets around the world.

I had few conversations with Mr. Cohen on this subject. As I recall, they were brief, and they were not memorable. I was not enthused about the proposal, and I do not recall any discussion of travel to Russia in connection with it. I do not remember discussing it with anyone else at the Trump Organization, although it is possible. I do not recall being aware at the time of any communications between Mr. Cohen or Felix Sater and any Russian government official regarding the Letter of Intent. In the course of preparing to respond to your questions, I have become aware that Mr. Cohen sent an email regarding the Letter of Intent to "Mr. Peskov" at a general, public email account, which should show there was no meaningful relationship with people in power in Russia. I understand those documents already have been provided to you.

I vaguely remember press inquiries and media reporting during the campaign about whether the Trump Organization had business dealings in Russia. I may have spoken with campaign staff or Trump Organization employees regarding responses to requests for information, but I have no current recollection of any particular conversation, with whom I may have spoken, when, or the substance of any conversation. As I recall, neither I nor the Trump Organization had any projects or proposed projects in Russia during the campaign other than the Letter of Intent.

#### **IV. Contacts with Russia and Russia-Related Issues During the Campaign**

- a. Prior to mid-August 2016, did you become aware that Paul Manafort had ties to the Ukrainian government? If yes, describe who you learned this information from, when, and the substance of what you were told. Did Mr. Manafort's connections to the Ukrainian or

Russian governments play any role in your decision to have him join your campaign? If yes, describe that role.

- b. Were you aware that Paul Manafort offered briefings on the progress of your campaign to Oleg Deripaska? If yes, describe who you learned this information from, when, the substance of what you were told, what you understood the purpose was of sharing such information with Mr. Deripaska, and how you responded to learning this information.
- c. Were you aware of whether Paul Manafort or anyone else associated with your campaign sent or directed others to send internal Trump campaign information to any person located in Ukraine or Russia or associated with the Ukrainian or Russian governments? If yes, identify who provided you with this information, when, the substance of the discussion(s), what you understood the purpose was of sharing the internal campaign information, and how you responded to learning this information.
- d. Did Paul Manafort communicate to you, directly or indirectly, any positions Ukraine or Russia would want the U.S. to support? If yes, describe when he communicated those positions to you and the substance of those communications.
- e. During the campaign, were you told about efforts by Russian officials to meet with you or senior members of your campaign? If yes, describe who you had conversations with on this topic, when, and what you were told.
- f. What role, if any, did you have in changing the Republican Party platform regarding arming Ukraine during the Republican National Convention? Prior to the convention, what information did you have about this platform provision? After the platform provision was changed, who told you about the change, when did they tell you, what were you told about why it was changed, and who was involved?
- g. On July 27, 2016, in response to a question about whether you would recognize Crimea as Russian territory and lift sanctions on Russia, you said: "We'll be looking at that. Yeah, we'll be looking." Did you intend to communicate by that statement or at any other time during the campaign a willingness to lift sanctions and/or recognize Russia's annexation of Crimea if you were elected?
  - i. What consideration did you give to lifting sanctions and/or recognizing Russia's annexation of Crimea if you were elected? Describe who you spoke with about this topic, when, the substance of the discussion(s).

#### **Response to Question IV, Parts (a) through (d)**

Mr. Manafort was hired primarily because of his delegate work for prior presidential candidates, including Gerald Ford, Ronald Reagan, George H.W. Bush, and Bob Dole. I knew that Mr. Manafort had done international consulting work and, at some time before Mr. Manafort left the



campaign, I learned that he was somehow involved with individuals concerning Ukraine, but I do not remember the specifics of what I knew at the time.

I had no knowledge of Mr. Manafort offering briefings on the progress of my campaign to an individual named Oleg Deripaska, nor do I remember being aware of Mr. Manafort or anyone else associated with my campaign sending or directing others to send internal Trump Campaign information to anyone I knew to be in Ukraine or Russia at the time or to anyone I understood to be a Ukrainian or Russian government employee or official. I do not remember Mr. Manafort communicating to me any particular positions Ukraine or Russia would want the United States to support.

#### **Response to Question IV, Part (e)**

I do not recall being told during the campaign of efforts by Russian officials to meet with me or with senior members of my campaign. In the process of preparing to respond to these questions, I became aware that on March 17, 2016, my assistant at the Trump Organization, Rhona Graff, received an email from a Sergei Prikhodko, who identified himself as Deputy Prime Minister of the Russian Federation, Foundation Roscongress, inviting me to participate in the St. Petersburg International Economic Forum to be held in June 2016. The documents show that Ms. Graff prepared for my signature a brief response declining the invitation. I understand these documents already have been produced to you.

#### **Response to Question IV, Part (f)**

I have no recollection of the details of what, when, or from what source I first learned about the change to the platform amendment regarding arming Ukraine, but I generally recall learning of the issue as part of media reporting. I do not recall being involved in changing the language to the amendment.

#### **Response to Question IV, Part (g)**

My statement did not communicate any position.

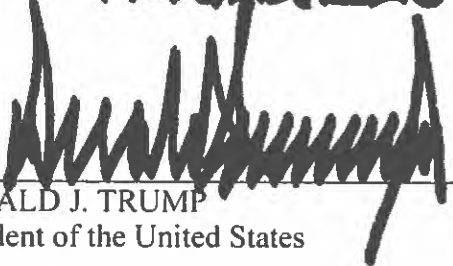
### **V. Contacts with Russia and Russia-Related Issues During the Transition**

- a. Were you asked to attend the World Chess Championship gala on November 10, 2016? If yes, who asked you to attend, when were you asked, and what were you told about about [*sic*] why your presence was requested?
  - i. Did you attend any part of the event? If yes, describe any interactions you had with any Russians or representatives of the Russian government at the event.

**Response to Question V, Part (a)**

I do not remember having been asked to attend the World Chess Championship gala, and I did not attend the event. During the course of preparing to respond to these questions, I have become aware of documents indicating that in March of 2016, the president of the World Chess Federation invited the Trump Organization to host, at Trump Tower, the 2016 World Chess Championship Match to be held in New York in November 2016. I have also become aware that in November 2016, there were press inquiries to my staff regarding whether I had plans to attend the tournament, which was not being held at Trump Tower. I understand these documents have already been provided to you.

Executed on **November 20**, 2018



DONALD J. TRUMP  
President of the United States